

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 04-10345-NMG
)	
MOHAMMED ABDUL RASHEED QURAISHI,)	
MOHAMMED ABDUL QAYIUM QURAISHI,)	
MOHAMMED ABDUL AZIZ QURAISHI,)	
)	
Defendants.)	

**MOTION OF DEFENDANT AZIZ QURAISHI
TO RELEASE PASSPORT TO COUNSEL UPON HIS SURRENDER TO BOP**

NOW COMES Defendant Mohammed Abdul Aziz Quraishi (“Aziz”) and hereby moves this Court to release his passport (issued by India) to the custody of his counsel, Hinckley, Allen & Snyder LLP, upon his surrender to his Federal Bureau of Prisons (“BOP”) designation. In support of this Motion, Aziz states as follows:

1. On November 18, 2004, Aziz was named in two counts of a five-count Indictment charging him with Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in violation of Law, in violation of 8 U.S.C. §1324(a)(1)(A)(iv) and 18 U.S.C. § 2 (Count 2) and Witness Tampering, in violation of 18 U.S.C. § 1512(b)(3) (Count 4). He was also charged in a Criminal Forfeiture allegation per 18 U.S.C. § 982(a)(6).

2. This Court’s Order Setting the Conditions of Release dated December 2, 2004 required Aziz to surrender his passport to Pre-trial Services. Aziz complied with this Order and Pre-trial Services is currently in possession of his passport.

3. The passport was issued to Aziz by India, where he is a citizen. Thus, it is important for Aziz to have the passport returned to him for purposes of his future travel plans following his release from prison.

4. Aziz was sentenced in this matter on March 30, 2007. He is scheduled to report to his BOP designation on May 18, 2007.

5. Undersigned counsel has been informed by Pre-trial Services that Aziz's passport will be forwarded to the United States Department of State upon his surrender to his BOP designation.

6. Aziz respectfully requests that, upon his surrender to his BOP designation, his passport be released to undersigned counsel instead of to the U.S. Department of State.

7. This will facilitate the prompt return of the passport to Aziz following his release from prison, and will provide for the safekeeping of the passport during his prison term.

8. The United States does not assent to the requested relief.

9. Aziz respectfully submits that no memorandum of law is required in support of the requested relief.

WHEREFORE, Defendant Mohammed Abdul Aziz Quraishi respectfully requests that this Court allow this motion, and, thereafter and upon his surrender to his BOP designation on May 18, 2007, release his passport to undersigned counsel.

Respectfully submitted,

COUNSEL FOR AZIZ QUARAISHI,

/s/ Laura B. Angelini

Michael J. Connolly (BBO # 638811)

Laura B. Angelini (BBO #658647)

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Dated: May 16, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2007, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Laura B. Angelini